

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

As representative of

THE COMMONWEALTH OF PUERTO RICO, et
al

Debtors¹

PROMESA

TITLE III

No. 17 BK 3283-LTS

(Jointly Administered)

This Filing relates to PREPA

**MOTION TO SUBSTITUTE EXHIBIT A AND ANEXO A TO THE TWO
HUNDRED NINETY-SIXTH OMBNIBUS OBJECTION (NON-SUBSTANTIVE)
OF THE PUERTO RICO ELECTRIC POWER AUTHORITY TO INCORRECT
DEBTOR AND MOTION SUBMITTING AMENDED EXHIBIT A AND ANEXO
A - THE SCHEDULE OF CLAIMS SUBJECT TO THE TWO HUNDRED
NINETY-SIX OMBNIBUS OBJECTION**

TO the Honorable United States District Court Laura Taylor Swain:

The Puerto Rico Electric Power Authority (“PREPA”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of PREPA pursuant to section 315(b) of the *Puerto Rico*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Oversight Management, and Economic Stability Act (“PROMESA”)² very respectfully submits:

1. On Friday, January 22, 2021, the Oversight Board through the undersigned filed the *Two Hundred Ninety-Six Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Claims Asserted Against the Incorrect Debtor* (the “Omnibus Objection”). ECF No. 15723.

2. As part of the Omnibus Objection, the Oversight Board attached Exhibit A, titled “Schedule of Claims Subject to the Two Hundred Ninety-Six Omnibus Objection,” and the Spanish translation of Exhibit A, Anexo A titled “Relación de Reclamaciones objeto de la Ducentésima Nonagésima Sexta Objeción Global” (together, “Exhibit A”).

3. The Oversight Board through the undersigned withdraws the aforementioned Exhibit A, because the versions filed were incorrect. In addition, the Oversight Board herewith files the corrected versions of Exhibit A, in both English and Spanish, (“Amended Exhibit A”). The Court and all the parties in interest shall disregard the Exhibit A attached to the Omnibus Objection (ECF Nos. 15723-1 and 15723-2) and substitute the Amended Exhibit A attached to this Notice.

NOTICE

4. In accordance with the Amended Omnibus Objection Procedures and the Court’s Notice Order, PREPA is providing notice of this motion to (a) the U.S. Trustee and (b) the Master Service List (as defined by the Thirteenth Amended Case Management Procedures [ECF No. 13512-1]), which is available on the Debtors’ case website at <https://cases.primeclerk.com/puertorico>. PREPA submits that, in light of the nature of the relief requested, no other or further notice need be given.

² PROMESA is codified at 48 U.S.C. §§2101-2241

RESPECTFULLY SUBMITTED:

In San Juan, Puerto Rico, this 27th day of January 2021

IT IS HEREBY CERTIFIED that the foregoing was file with the Clerk of the Court using the CM/ECF system, which will send notification electronically to all counsel of record.

/s/ Ricardo Burgos Vargas

Ricardo Burgos Vargas

PR USDC No. 218210

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